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*Counsel for Michael Goldberg,
Trustee of the PFI Trust*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:
**PROFESSIONAL FINANCIAL INVESTORS,
INC.,** a California corporation, et al.,

Debtors.

Case No. 20-30604 (HLB)

(Jointly Administered)

Chapter 11

**STIPULATION DISCONTINUING
SERVICES OF CLAIMS,
NOTICING AND SOLICITATION
AGENT**

This *Stipulation Discontinuing Services of Claims, Noticing and Solicitation Agent* (“Stipulation”) is entered into by and between the PFI Trust (the “Trust”), on the one hand, and Donlin Recano & Company, Inc. (“Agent”), on the other hand. In this Stipulation, the Trust and Agent are sometimes referred to as the “Parties.”

RECITALS

A. On August 25, 2020, the above-captioned Debtors filed an *Application of Debtors Pursuant to 28 U.S.C. § 156(c) and 11 U.S.C. §§ 105(a), 327, and 503(b) for an Order Appointing Donlin, Recano & Company, Inc. as Claims, Noticing, and Solicitation Agent* [Docket No. 89] (the “Retention Application”). The Retention Application was granted by the Court’s Order Appointing Donlin, Recano & Company, Inc., as Claims, Noticing, and Solicitation Agent,

1 dated September 8, 2020 [Docket No. 102] (“Retention Order”).

2 B. On November 2, 2021, the United States Bankruptcy Court for the Northern
3 District of California (the “Court”), entered an order confirming the *Modified Second Amended*
4 *Joint Chapter 11 Plan of Professional Financial Investors, Inc. and its Affiliated Debtors*
5 *Proposed by the Debtors and Official Committee of Unsecured Creditors and Supported by the*
6 *Ad Hoc LLC Members Committee and Ad Hoc DOT Noteholders Committee filed on November 1,*
7 *2021* [Dkt. No. 964] (the “Plan”).

8 C. On December 15, 2021, the Plan became effective by its terms (the “Effective
9 Date”) and the Trust was formed [Docket No. 1042].

10 D. The Trustee has determined that the continued expense of the Agent now
11 outweighs the benefit received by the Trust.

12 STIPULATION

13 NOW, THEREFORE, the Parties stipulate and agree as follows:

- 14 1. The foregoing recitals are true and correct.
15 2. The Agent’s services shall be terminated as the date an order approving this
16 Stipulation is entered.

17
18 Dated: February 14, 2023

PFI Trust


19 By: /s/ John D. Fiero

20 John D. Fiero
21 Counsel for PFI Trust

22 Dated: February 14, 2023

Donlin, Recano & Company, Inc.

23 By

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25 Nellwyn Voorhies
26 President for Donlin, Recano & Company, Inc.
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